

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 19-CR-201

MASON BEAUDRY,

Defendant.

MOTION TO SCHEDULE CHANGE OF PLEA

Mason Beaudry, by counsel, hereby requests that the Court take this matter off the trial calendar and schedule a change of plea during the week of January 27, 2020. As grounds, counsel submits the following:

1. Mr. Beaudry is charged in one count of a two count indictment with possession of a firearm by a convicted felon in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

2. Mr. Beaudry made his initial appearance and was arraigned on that count on November 19, 2019. He was released on a signature bond with all standard conditions and the following special conditions: report to pretrial services as directed; avoid all contact with co-defendant, Juan Cardenas; do not possess a firearm; and, substance abuse testing and treatment as determined by

pretrial services. To counsel's knowledge, Mr. Beaudry has been compliant with conditions of release.

3. The final pretrial conference is currently scheduled for January 9, 2020, and trial set for January 27, 2020. Mr. Beaudry has informed counsel that he intends to plead guilty to the indictment in this case. Mr. Beaudry has received a copy of the plea agreement, however with his work schedule and counsel being out of the office recently, we have been unable to meet to discuss it in detail. Counsel has communicated with Mr. Beaudry and intends to file a signed plea agreement no later than next week.

4. Counsel also communicated with Assistant United States Attorney Daniel Humble and he has no objection to this request.

THEREFORE, on the above grounds, Mason Beaudry respectfully requests that the pretrial conference and trial in this matter be taken off the calendar and a change of plea hearing be scheduled during the week of January 27 or sometime thereafter.

Dated at Green Bay, Wisconsin, this 8th day of January 2020.

Respectfully submitted,

s/ Krista Halla-Valdes

Krista Halla-Valdes, FL Bar #073369
Attorney for Mason Beaudry

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